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10 Attorneys for Counterdefendant SANDEEP SOOD and
11 MONSOON ENTERPRISES, INC., a California corporation

12 UNITED STATES DISTRICT COURT
13
14 NORTHERN DISTRICT OF CALIFORNIA
15
16 SAN FRANCISCO DIVISION

17 NEXTDOOR.COM, INC., a Delaware
18 corporation,

19 Plaintiff,

20 v.

21 RAJ ABHYANKER, an individual,
22 Defendant.

23 RAJ ABHYANKER, an individual,

24 Counterclaimant,

25 v.

26 NEXTDOOR.COM, INC., a Delaware
27 corporation; PRAKASH JANAKIRAMAN, an
28 individual; BENCHMARK CAPITAL
PARTNERS, L.P., a Delaware limited
partnership; BENCHMARK CAPITAL
MANAGEMENT CO. LLC, a Delaware limited
liability company; SANDEEP SOOD, an
individual; MONSOON ENTERPRISES, INC., a
California corporation, and DOES 1-50,
inclusive,

Counterdefendants.

Case No.: 3:12-cv-05667-EMC

**DECLARATION OF HARPREET S. WALIA
IN SUPPORT OF COUNTERDEFENDANTS
SANDEEP SOOD AND MONSOON
ENTERPRISES, INC.'S REQUEST FOR
JUDICIAL NOTICE**

Complaint Filed: November 5, 2012
Counterclaim Filed: January 10, 2013
First Amended Counterclaim Filed: April 8, 2013

Date: June 6, 2013
Time: 1:30 PM
Judge: Honorable Edward M. Chen
Place: Courtroom 5 - 17th Floor
450 Golden Gate Avenue
San Francisco, California 94102

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DECLARATION OF HARPREET S. WALIA IN SUPPORT OF COUNTERDEFENDANTS SANDEEP SOOD AND MONSOON ENTERPRISES, INC.'S REQUEST FOR JUDICIAL NOTICE

1 I, HARPREET S. WALIA, do hereby declare as follows:

2 1. I am an attorney at law and a member of the Royse Law Firm, PC, which represents
3 Counterdefendants Sandeep Sood (“Sood”) and Monsoon Enterprises, Inc., a California corporation
4 (“Monsoon”) before the Court in this action. I am licensed to practice law in the State of California and
5 admitted before this Court. I have personal knowledge of each of the facts set forth herein, and would
6 competently testify to the truth thereof if called as a witness.

7 2. Attached to Counterdefendants’ Request for Judicial Notice as **Exhibit 1** is a true and
8 correct copy of Counterclaimant Raj Abhyanker’s Complaint for Damages and Equitable Relief for
9 Intentional Interference with Existing and Prospective Economic Advantage, Breach of Confidence,
10 Breach of Contract, Fraud and Conspiracy to Defraud, Constructive Fraud and Aiding and Abetting
11 Constructive Fraud, Unjust Enrichment, Unfair Business Acts and Practices in Violation of Business
12 and Professions Code (Cal.Civ.Code § 17200, *et seq.*), Violations of the California Corporate Securities
13 Laws, and Misappropriation of Trade Secrets (Cal.Civ.Code § 3426, *et seq.*), filed on November 10,
14 2011 in the Superior Court of California, County of Santa Clara, as Civil Case No. 1-10-CV-212924.

15 3. Attached to Counterdefendants’ Request for Judicial Notice as **Exhibit 2** is a true and
16 correct copy of Counterclaimant Raj Abhyanker’s First Amended Complaint for and Misappropriation
17 of Trade Secrets (Cal.Civ.Code § 3426, *et seq.*), Fraud and Conspiracy to Defraud, Constructive Fraud
18 and Aiding and Abetting Constructive Fraud, Negligent Interference with Existing and Prospective
19 Economic Advantage, Breach of Confidence, Breach of Contract, Breach of Implied Covenant of Good
20 Faith and Fair Dealing, Negligent Misrepresentation, Tortious Interference with Contract, Unjust
21 Enrichment, Unfair Business Acts and Practices in Violation of Business and Professions Code
22 (Cal.Civ.Code § 17200, *et seq.*), Violations of the California Corporate Securities Laws, and
23 Conversion, filed on December 6, 2011 in the Superior Court of California, County of Santa Clara, as
24 Civil Case No. 1-11-CV-212924.

25 4. Attached to Counterdefendants’ Request for Judicial Notice as **Exhibit 3** is a true and
26 correct copy of Counterclaimant Raj Abhyanker’s November 22, 2006 patent application no.
27 11/603,442; Publication Date September 20, 2007, entitled “Map Based Neighborhood Search and
28 Community Contribution.”

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct and that this Declaration is executed this 25th day of April, 2013 at Palo Alto,
3 California.

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6 /s/ Harpreet S. Walia

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